

**IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

*In re*

Boy Scouts of America and Delaware BSA,  
LLC, <sup>1</sup>

Debtors.

Chapter 11

Bankruptcy Case No.  
20-10343 (LSS)

(Jointly Administered)

National Union Fire Insurance Co. of  
Pittsburgh, PA, *et al.*,

Appellants.

v.

Case No. 22-cv-01237-RGA

Boy Scouts of America and Delaware BSA,  
LLC,

Appellees.

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5 and the attached certification, counsel moves for the admission *pro hac vice* of Mitchell A. Karlan, Esquire to represent Appellants:

---

<sup>1</sup> The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300); and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

National Union Fire Insurance Company of Pittsburgh, PA; Lexington Insurance Company; Landmark Insurance Company; and The Insurance Company of the State of Pennsylvania.

Dated: 10/28/22

/s/ Deirdre M. Richards

Deirdre M. Richards (No.4191)  
Fineman Krekstein & Harris, PC  
1300 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 558-8331  
Fax: (302) 394- 9228

[drichards@finemanlawfirm.com](mailto:drichards@finemanlawfirm.com)

*Attorneys for Appellants: National Union Fire Insurance Company of Pittsburgh, PA; Lexington Insurance Company; Landmark Insurance Company; and The Insurance Company of the State of Pennsylvania*

**IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

*In re*

Boy Scouts of America and Delaware BSA,  
LLC, <sup>1</sup>

Debtors.

Chapter 11

Bankruptcy Case No.  
20-10343 (LSS)

(Jointly Administered)

National Union Fire Insurance Co. of  
Pittsburgh, PA, *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA,  
LLC,

Appellees.

Case No. 22-cv-01237-RGA

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission *pro hac vice* is granted.

Date: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

<sup>1</sup> The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300); and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

**IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

*In re*

Boy Scouts of America and Delaware BSA,  
LLC, <sup>1</sup>

Debtors.

Chapter 11

Bankruptcy Case No.  
20-10343 (LSS)

(Jointly Administered)

National Union Fire Insurance Co. of  
Pittsburgh, PA, *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA,  
LLC,

Appellees.

Case No. 22-cv-01237-RGA

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the bar of the State of New York and the District of Columbia, the United States District Courts for the Southern, Eastern and Northern Districts of New York, the Northern District of Texas, the District of Arizona and the Eastern District of Wisconsin, the United States Court of Appeals for the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 7<sup>th</sup>, 9<sup>th</sup>, 10<sup>th</sup>, 11<sup>th</sup> and District of Columbia Circuits and the United States Supreme Court. Pursuant to Local Rule

---

<sup>1</sup> The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300); and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

83.6, I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or the course of this action. I also certify that I am generally familiar with this Court's local rules and with the revised Standing Order for the District Court Fund. I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court for the District Court upon the filing of this motion.

Date: 10/27/22

/s/ Mitchell A. Karlan

Mitchell A. Karlan, Esquire  
Gibson, Dunn & Crutcher LLP  
200 Park Avenue  
New York, NY 10166-0193  
Telephone (212) 351-3827;  
Fax (212) 351-5254  
MKarlan@gibsondunn.com